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**UNITED STATES BANKRUPTCY COURT**

**EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION**

In re:  
**PEDRO NAVEIRAS, JR**  
**AND**  
**ZENAIDA NAVEIRAS**  
Debtor.

Case No: 2015-10233  
Chapter 13  
Docket Control No.: MHM-2

**Date: September 29, 2015**  
**Time: 1:30 p.m.**  
**Place: 510 19<sup>th</sup> Street**  
**Bakersfield, CA**

**DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS**  
**TO THE HONORABLE FREDRICK CLEMENT, MICHAEL**  
**MEYERS/CHAPTER 13 TRUSTEE, AND ALL INTERESTED PARTIES:**

**DEBTORS** hereby respond to Trustee's Motion to Dismiss, which was filed on July 10, 2015

1. Debtors have provided their 2012 taxes to the trustee's office via email.
2. Debtors are willing to increase the payments as necessary as the liquidation analysis requires they pay 100% to the allowed claims of unsecured creditors.

Wherefore Debtors ask that Trustee's Motion to Dismiss be overruled as the debtors have informed our office that they are current and the motion to value collateral has been filed with the court.

Dated: August 12, 2015

**The Law Offices of Neil E. Schwartz**

/s/  
Neil E. Schwartz  
Attorneys for Debtor